

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

Y.

GEORGE SCHUSSEL,  
Defendant

Cr. No. 04-10060-RCL

## AGREED-TO PRETRIAL SCHEDULE

Now comes the Defendant, George Schussel, and the Government, each through undersigned counsel, who hereby file this notice of a pretrial disclosure schedule agreed to by both parties that, if ordered by this Honorable Court, would set dates for disclosures based on the trial date of January 8, 2007:

1. That on November 9, 2006, the Government will disclose to the Defendant any and all reports and/or summary of expected testimony of experts as required upon request by Fed. R. Crim. P. 16(a)(1)(G) and would provide notice and corresponding discovery relating to any evidence it intended to rely on that would be offered pursuant to F.R.E. 404(b);
2. That on December 9, 2006, the Defendant will disclose to the Government any and all reports and/or summary of expected testimony of experts as required by Fed. R. Crim. P 16(C);
3. That on December 18, 2006, the Government will disclose to the defendant any and all witness statements (§3500 material), a witness list as required by Local Rule 117.1(8)(a), an exhibit list and a copy of exhibits in both hardcopy and electronic form as required by Local Rule 117.1(8)(b), and any and all exculpatory information as required by Local Rule 116.2 (B)(2);

4. That on December 18, 2006, the Defendant is required to file any and all Motions in Limine and that the Defendant reserves the right to file pretrial objections to Government exhibits on or before December 20, 2006. The Government will respond on or before December 29, 2006; and
5. That on December 29, 2006, the Defendant will disclose to the Government a witness list, an exhibit list, a copy of exhibits in both hardcopy and electronic form and the Government reserves the right to file any objections or Motions in Limine on or before January 5, 2007.

Additionally, the parties will meet to discuss stipulations with the expectation of stipulating to certain business records on December 18, 2006.

MICHAEL J. SULLIVAN,  
United States Attorney,

GEORGE SCHUSSEL,  
By his Attorneys,

*By: /s/ Carmen Ortiz*  
Assistant U.S. Attorney

*/s/ Martin G. Weinberg, Esq.*  
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#### **CERTIFICATE OF SERVICE**

I hereby certify that the above document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the NEF including Carmen Ortiz, Assistant United States Attorney, John Joseph Moakley Federal Courthouse, 1 Courthouse Way, Suite 9200, Boston, MA 02210 on this 4<sup>th</sup> day of August, 2006, and paper copies will be sent to those indicated as non-registered participants.

*/s/ Martin G. Weinberg*